

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF:**

**CHAPTER 13 CASE NO.:**

**JESSICA SANDERS**

**24-10888-JDW**

**OBJECTION TO MOTION FOR REINSTATEMENT**

COMES NOW the Chapter 13 Trustee, Locke D. Barkley (the "Trustee"), by and through counsel, and files this Objection to Motion for Reinstatement (Dkt. #40) (the "Motion") and in support thereof states as follows:

1. On October 27, 2020, the Debtor initiated this proceeding with the filing of a Chapter 13 Bankruptcy Petition (Dkt. #1). The Court entered the Order of Dismissal for Failure to Timely File Documents or to Pay Required Fees (Dkt. #36) on May 29, 2024, as a result of the Debtor's failure to pay a required filing fee installment.

2. Although the Trustee received \$1,700.00 from the Debtor following dismissal of this case, an additional \$1,983.34 is needed to bring the plan payments current through June 2024. Plan payments continue to accrue at the rate of \$1,841.67 monthly thereafter.

3. The Trustee does not object to the reinstatement of this case but requests that all plan payments be current prior to the entry of an order reinstating the bankruptcy case.

WHEREFORE, PREMISES CONSIDERED, the Trustee prays that upon notice and hearing that this Court enter its order denying the Motion and for such other relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: July 8, 2024.

Respectfully submitted,

**LOCKE D. BARKLEY**  
**CHAPTER 13 TRUSTEE**

By: /s/ Melanie T. Vardaman  
ATTORNEYS FOR TRUSTEE  
W. Jeffrey Collier (MSB 10645)  
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**CERTIFICATE OF SERVICE**

I, the undersigned attorney for the Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the Debtor, attorney for the Debtor, the United States Trustee, and other parties in interest, if any, as identified below.

Dated: July 8, 2024.

/s/ Melanie T. Vardaman  
MELANIE T. VARDAMAN